UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATE OF AMERICA)	
v.)	Criminal No. 12 10017 H T
ALEXIS HIDALGO, et al, Defendants.)	Criminal No. 13-10017-JLT
)	

AMENDED JOINT MOTION TO MODIFY DISCOVERY ORDER

Defendants hereby amend their Joint Motion to Modify Discovery Order [Document 535] to add Defendant Alexis Hidalgo, through his undersigned counsel, as Mr. Hidalgo was inadvertently left off of the original motion.

Defendants move to modify the discovery schedule set forth at the April 26, 2013 Initial Status Conference in the above-captioned case. During that Status Conference, the government represented that automatic discovery was ongoing and anticipated that it would be completed by close of business on June 14, 2013. Based on that representation, the Court set July 10, 2013 as the deadline by which defense counsel must submit requests for additional discovery pursuant to Local Rule 116.3. However, the government's automatic discovery remains ongoing.

Moreover, following the Status Conference, Emma M. Greenwood was appointed Coordinating Discovery Attorney for the defendants. As such, the government is making its discovery productions to Ms. Greenwood first, who organizes those materials and distributes them in turn to the individual defendants.

On July 8, 2013, Ms. Greenwood informed defense counsel, including the undersigned, that she received an additional discovery production from the government on July 5, 2013.

Undersigned counsel has not yet received that production, and therefore has not had an opportunity to review it.

Based on the foregoing, Defendants request that the Court extend the deadline for requests for additional discovery to thirty (30) days following the date on which Ms. Greenwood produces to Defendants those materials that the government represents to mark the completion of its automatic discovery in the above-captioned case.

Dated: July 10, 2013

Respectfully Submitted,

By:

JOHN ALVES By his Attorney, **PATRICK GOMES** By his Attorney,

/s/ Alathea E. Porter

Emily R. Schulman (BBO # 566374) Alathea E. Porter (BBO # 661100) WILMER CUTLER PICKERING HALE AND DORR LLP 60 State Street Boston, MA 02109 Tel: (617) 526-6000

Fax: (617) 526-5000 Emily.Schulman@wilmerhale.com Alathea.Porter@wilmerhale.com

/s/ George F. Gormley

George F. Gormley GEORGE F. GORMLEY, P.C. 755 East Broadway 3rd Floor South Boston, MA 02127 617-268-2999 617-268-2911 (fax) gfgormley@aol.com

JERRY CORREIA By his Attorney,

/s/ Debra A. DelVecchio Debra A. DelVecchio DelVecchio & Houseman The Perry Building

MICHAEL BEAL By his Attorney,

/s/ Michele Adelman Michele L. Adelman Foley Hoag LLP 155 Seaport Boulevard 15 Front Street Salem, MA 01970 978-740-5999 Fax: 978-740-9434

Email: dadelvecchio@verizon.net

Seaport World Trade Center West Boston, MA 02210 617-832-1278 Email: madelman@foleyhoag.com

DULSILINA TAVARES
By her Attorney,

/s/ James J. Cipoletta Citizens Bank Building, Suite 307 385 Broadway Revere, MA 02151 781-289-7777 Fax: 781-289-9468

Email: jcipoletta@comcast.net

NICHOLAS OTEY By his Attorney,

/s/ Jane F. Peachy
Jane F. Peachy
Federal Public Defender Office
District of Massachusetts
51 Sleeper Street
5th Floor
Boston, MA 02210
617-223-8061
Email: jane_peachy@fd.org

MORRIS ROBINSON By his Attorney,

/s/ Stephen J. Weymouth Stephen J. Weymouth Law Office of Stephen J. Weymouth Suite 3 65a Atlantic Ave Boston, MA 02110 617-573-9598 JEREMIA BARBOSA By his Attorney,

/s/ Leslie Feldman-Rumpler Law Office of Feldman-Rumpler 101 Tremont Street Suite 708 Boston, MA 02108 617-728-9944 Email: lfeldmanr@aol.com

ILTON CORREIA By his Attorney,

/s/ Mark W. Shea Mark W. Shea Shea & LaRocque Suite 201 47 Third Street Cambridge, MA 02141-1265 617-577-8722 Fax: 617-577-7897

Email: markwshea@gmail.com

ALEXANDER DASILVA By his Attorney,

/s/ Carlos Jorge Dominguez Carlos Jorge Dominguez 343 Commercial Street Boston, MA 02109 617-742-2824 Fax: 617-720-0707 Email: dmngzcarlos@aol.com Fax: 617-367-1407

Email: SWeymouth@SWeymouthLaw.com

MAURICE BARNETT By his Attorney,

/s/ Keith S. Halpern Keith S. Halpern 572 Washington Street Suite 19 Wellesley, MA 02482 617-722-9952

Email: ksh@keithhalpern.com

HAMZA AWIL By his Attorney,

/s/ Thomas J. Iovieno Thomas J. Iovieno 755 East Broadway 3rd Floor South Boston, MA 02127 617-464-3300 Fax: 617-464-3302

Email: tjilaw@yahoo.com

RUTH RIVERA-LOPES By her Attorney,

/s/ Liam D. Scully Liam D. Scully 101 Summer Street Fourth Floor Boston, MA 02110 781-834-4000 Fax: 617-439-0325

Email: liamdscully@aol.com

JOSHUA BRANDAO By his Attorney,

/s/ David Duncan
David Duncan
Zalkind Duncan & Bernstein
65a Atlantic Ave
Boston, MA 02110
617-742-6040
Fax: 617-742-3269

Email: dduncan@zalkindlaw.com

HAMILTON LOPES By his Attorney,

/s/ Michael F. Natola Michael F. Natola Natola Associates, LLC 175 Andover Street Suite 205 Danvers, MA 01923 978-739-9300 Fax: 978-739-9301

Email: MNatola@NatolaAssociates.com

JULIO COLLAZOS By his Attorney,

/s/ Martin K. Leppo Leppo & Leppo 7 Christy's Drive Brockton, MA 02301 508-580-3733

Email: kim2leppo@aol.com

JACKSON BARROS By his Attorney,

/s/ Peter C. Horstmann
Peter C. Horstmann
Law Offices of Partridge, Ankner &
Horstmann, LLP
200 Berkeley Street, 16th Floor
Boston, MA 02116
617-859-9999

Fax: 617-859-9998 Email: pete@horstmannlaw.com

VICTOR SCOTT By his Attorney,

/s/ John G. Darrell John G. Darrell 16 School Street,2nd Fl. Dedham, MA 02026 781-407-9799 Fax: 781-407-9798

Email: attyjgd@verizon.net

LEAKANA OM By her Attorney,

/s/ Paul J. Garrity
Paul J. Garrity
14 Londonderry Road
Londonderry, NH 03053
603-434-4106
Fax: 603-437-6473

Email: garritylaw@myfairpoint.net

BENJAMIN BAPTISTA By his Attorney,

/s/ Janice Bassil Carney & Bassil 20 Park Plaza, Suite 1405 Boston, MA 02116 617-338-5566 Fax: 617-338-5587

Email: JBassil@CarneyBassil.com

MARTINHO RODRIGUES By his Attorney,

/s/ Inga L. Parsons
Inga L. Parsons
Inga Parsons Attorney at Law
3 Besson Street, # 234
Marblehead, MA 01945
781-581-2262

Fax: 781-842-1430

Email: inga@ingaparsonslaw.com

ALEXIS HIDALGO By his Attorney,

/s/ Robert L. Sheketoff Robert L. Sheketoff One McKinley Square Boston, MA 02109 617-367-3449 Fax: 617-723-1710

Email: sheketoffr@aol.com

LOCAL RULE 7.1(A)(2) CERTIFICATION

I, Emily Schulman, hereby certify that I contacted the government about the proposed amendment and the proposed modification to the Court's discovery schedule before filing this motion, but have not yet ascertained the government's position on the motion.

/s/ Emily R. Schulman
Emily R. Schulman

CERTIFICATE OF SERVICE

I, Alathea Porter, hereby certify that a true and accurate copy of this document was served via ECF on July 10, 2013 to all registered participants as identified on the Notice of Electronic Filing.

/s/ Alathea Porter Alathea E. Porter